The Advisory Committee on Commercial Operations of Customs and Border Protection (COAC) believes that trade facilitation and management by account are urgent priorities of US Customs and Border Protection (CBP). Advancing this concept of trade facilitation and management by account is also a top priority of COAC as communicated in our May 2009 proposal.

We wish to formally express our concern relating to the insufficient progress on this May 2009 COAC proposal and recommend:

- CBP increase active consultation and engagement with COAC on concepts or programs they are developing;
- CBP senior officials increase prioritization in the CBP offices affected by the efforts to improve trade facilitation; and,
- CBP begin immediate consultation with the subcommittee to produce an action plan with goals and estimated deliverable dates for the highest priority issues for review at the next COAC meeting.

COAC also recommends that the participation in the work of the Trade Facilitation subcommittee be expanded, where appropriate, to non-COAC representatives of the trade community in order to ensure that all perspectives and areas of functional expertise are represented in the work of the subcommittee.